

EXHIBIT C

From: [St. John, Joseph](#)
To: [Ryan, Erin T. \(CIV\)](#); [Ward, Brian C. \(CIV\)](#); [Darrow, Joseph A. \(CIV\)](#); [Reuveni, Erez R. \(CIV\)](#)
Cc: [Redmon, Jordan](#); james.percival@myfloridalegal.com; "Anita Patel"
Subject: [EXTERNAL] RE: Arizona v. Garland, No. 6:22-cv-130 (W.D. La.) - Plaintiff States' Discovery Responses
Date: Tuesday, April 11, 2023 5:15:06 PM
Attachments: [image001.png](#)

Ms. Ryan:

Defendants requested a rolling document production, and Plaintiff States agreed to that request on a reciprocal basis. *See, e.g.*, St. John email to Ward (Mar. 28, 2023); Defendants' Responses (Mar. 24, 2023). To the extent Rule 34(b)(2)(E) requires labelling produced documents – and it does so only if those documents are not produced as kept in the ordinary course of business – doing so only makes sense after document production is substantially complete. Defendants appear to agree. Indeed, Mr. Ward stated that Defendants “plan to serve updated responses and objections once we have completed [Defendants'] search and production.” Ward email to St. John (Mar. 30, 2023). Consistent with common sense and Defendants' position, Plaintiff States will label documents – to the extent required by Rule 34(b)(2)(E) – after their document production is substantially complete.

Best regards,
Scott

From: Ryan, Erin T. (CIV) <Erin.T.Ryan@usdoj.gov>
Sent: Monday, April 10, 2023 12:39 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>; Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>; Darrow, Joseph A. (CIV) <Joseph.A.Darrow@usdoj.gov>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>
Cc: Redmon, Jordan <RedmonJ@ag.louisiana.gov>; james.percival@myfloridalegal.com; 'Anita Patel' <Anita.Patel@myfloridalegal.com>
Subject: RE: Arizona v. Garland, No. 6:22-cv-130 (W.D. La.) - Plaintiff States' Discovery Responses

CAUTION: *This email originated outside of Louisiana Department of Justice. Do not click links or open attachments unless you recognize the sender and know the content is safe.*

Counsel,

Thank you for your production. We noticed that your responses do not identify any documents being produced, so it is unclear which documents are being produced in response to which requests. In order for us to adequately review your responses for completeness, we ask that you please update your responses to indicate which documents are being produced in response to which request.

We would ask that you please do this by end of day Wednesday, April 12, so the parties can move forward with any potential meet and confer that may need to take place.

Thank you,

Erin Ryan

Trial Attorney

U.S. Department of Justice – Civil Division

Office of Immigration Litigation – District Courts Section

Post Office Box 868 | Ben Franklin Station | Washington, D.C. 20044

erin.t.ryan@usdoj.gov | C: 202-532-5802

From: St. John, Joseph <StJohnJ@ag.louisiana.gov>

Sent: Thursday, April 6, 2023 10:21 AM

To: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>; Ryan, Erin T. (CIV) <Erin.T.Ryan@usdoj.gov>;
Darrow, Joseph A. (CIV) <Joseph.A.Darrow@usdoj.gov>; Reuveni, Erez R. (CIV)
<Erez.R.Reuveni@usdoj.gov>

Cc: Redmon, Jordan <RedmonJ@ag.louisiana.gov>; james.percival@myfloridalegal.com; 'Anita Patel'
<Anita.Patel@myfloridalegal.com>

Subject: [EXTERNAL] RE: Arizona v. Garland, No. 6:22-cv-130 (W.D. La.) - Plaintiff States' Discovery Responses

Counsel:

With apologies for the delay, Plaintiff States' first production of documents is available at the following ftp:

https://ft.ag.state.la.us/public/folder/6X8NJRIaEEKD9Fisv_X-0A/Duplicate

Best regards,
Scott



Joseph Scott St. John

Deputy Solicitor General

Office of Attorney General Jeff Landry

Tel: (225) 485-2458

stjohnj@ag.louisiana.gov

www.AGJeffLandry.com

From: St. John, Joseph

Sent: Monday, April 3, 2023 2:01 PM

To: 'Ward, Brian C. (CIV)' <Brian.C.Ward@usdoj.gov>; Ryan, Erin T. (CIV) <Erin.T.Ryan@usdoj.gov>;
Darrow, Joseph A. (CIV) <Joseph.A.Darrow@usdoj.gov>; Reuveni, Erez R. (CIV)
<Erez.R.Reuveni@usdoj.gov>

Cc: Redmon, Jordan <RedmonJ@ag.louisiana.gov>; james.percival@myfloridalegal.com; 'Anita Patel'
<Anita.Patel@myfloridalegal.com>

Subject: Arizona v. Garland, No. 6:22-cv-130 (W.D. La.) - Plaintiff States' Discovery Responses

Counsel:

Louisiana and Florida's discovery responses are attached. Consistent with the parties' agreement, our initial document production should follow later today or tomorrow.

Best regards,
Scott



Joseph Scott St. John

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